

July 2, 2002

Mr. Carlos Robles  
APG, Inc.  
P.O. Box 878  
Elkhart, Indiana 46515

Re: 039-15734  
Second Notice-only change to  
MSOP 039-10527-00050

Dear Mr. Robles:

APG, Inc. was issued a permit on October 5, 1999, for the operation of a consumer product packaging plant. A letter notifying the Office of Air Quality of changes in the operation was received on June 12, 2002. The changes are related to the mixing and filling of products containing glycol ether in Corporate Aerosol filling Line (Line 40). The potential to emit of VOCs from this process is less than 10 tons per year. According to 326 IAC 2-6.1-6(g)(4)(B)(iii), minor permit revisions can be used only for modifications with potential to emit of VOCs "less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year". Since the modification involved has a potential to emit below this threshold, a notice-only change is hereby being granted. Pursuant to 326 IAC 8-1-6, the best available control technology (BACT) determined for the Corporate Aerosol Line shall be unchanged from that determined in MSOP No. 039-10527-00050. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The facility description in Section A.2 is modified as follows:

A.2 Emissions units and Pollution Control Equipment Summary

This consumer product packaging source is approved to construct and operate the following emissions units and pollution control devices:

(a) ..... (d)

(e) One (1) Corporate Aerosol Line, **identified as Line 40**, with a production rate of ~~750~~ **1134.4** gallons/hour **for liquid product filling, and 200 cans/minute for propellant filling.**

(2) The facility description in Section D.1 is modified as follows:

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

(a).....(d)

(e) One (1) Corporate Aerosol Line, **identified as Line 40**, with a production rate of ~~750~~ **1134.4** gallons/hour **for liquid product filling, and 200 cans/minute for propellant filling.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY**

**APG, Inc.  
1919 Superior Street  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Minor Source Operation Permit No.: 039-10527-00050	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 5, 1999

First Notice Only Change No. 039-11498

Issuance Date: November 10, 1999

Second Notice Only Change: 039-15734	
Pages Modified: 5, 16	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 2, 2002

- (e) One (1) Corporate Aerosol Line, identified as Line 40, with a production rate of 1134.4 gallons/hour for liquid product filling, and 200 cans/minute for propellant filling.
- (f) Four (4) Volatile Organic Liquid (VOL) Storage Tanks, S1 and S2, each has a capacity of 6500 gallons each; and SA3 and SA4 each has a capacity of 6000 gallons.
- (g) Eight (8) Pressure Propellant Tanks, identified as S5 through S12. Each tank has a capacity of 10,000 gallons.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) The source shall submit a Title V permit application within twelve (12) months after the source becomes subject to Title V. This 12-month period starts at the postmarked submission date of the Affidavit of Construction.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

- (a) Cough Syrup Line ID21, with a capacity of 375 gallons per hour. This line includes compounding/mixing and liquid product filling operations, with two (2) mixing vessels M1, and M2 each has a capacity of 1,520 gallons and two (2) process vessels P1 and P2, each has a capacity of 1,360 gallons.
- (b) Cake Icing Line ID20, with a capacity of 150 gallons per hour. This line includes compounding/mixing and liquid product filling operations, with one (1) mixing vessel M3, with a capacity of 100 gallons, two (2) process vessels P3 and P4 each has a capacity of 50 gallons, one (1) holding vessel H1, with a capacity of 500 gallons.
- (c) Liquid Product Lines 22, 23, 24, and 25. Product Line 22 has a capacity of 562.5 gallons per hour, Product Line 25 has a capacity of 508 gallons per hour. Product Lines 23 and 24 are used for non-VOC products. Each line includes compounding/mixing and liquid product filling operations, with twelve (12) mixing vessels M4 through M7 each has a capacity of 350 gallons, M8 and M9 each has a capacity of 2,000 gallons, M10 has a capacity of 550 gallons, M11 through M15 each has a capacity of 500 gallons; three (3) holding tanks H2, H3, and H4 each has a capacity of 5,000 gallons.
- (d) Tube/Stick Product Lines 26, 27, 28 and 29. Each line includes compounding/mixing and tube/stick product filling operations. All Lines have a combined production rate total of 175.0 gallons/hour.
- (e) One (1) Corporate Aerosol Line, identified as Line 40, with a production rate of 1134.4 gallons/hour for liquid product filling, and 200 cans/minute for propellant filling.
- (f) Four (4) Volatile Organic Liquid (VOL) Storage Tanks, S1 and S2, each has a capacity of 6500 gallons each; and SA3 and SA4 each has a capacity of 6000 gallons.
- (g) Eight (8) Pressure Propellant Tanks, identified as S5 through S12. Each tank has a capacity of 10,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards

### D.1.1 Volatile Organic Compounds (VOC) [BACT Minor Limitation]

- (a) The volatile organic compounds (VOC) compounded and filled into containers from Liquid Product Line 22 shall be limited such that the VOC emissions shall be less than 25 tons per twelve- month period, rolled on a monthly basis.

During the first twelve (12) months of operation, VOC compounded and filled shall be limited such that the total VOC compounded and filled divided by accumulated months of operation shall be less than VOC emissions of 2.08 tons per month, rolled on a monthly basis. Therefore, 326 IAC 8-1-6 will not apply.

- (b) The volatile organic compounds (VOC) compounded and filled into containers from Liquid Product Line 25 shall be limited such that the VOC emissions shall be less than 25 tons per twelve- month period, rolled on a monthly basis.